

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DISH NETWORK CORPORATION and	:	
DISH NETWORK L.L.C.	:	
	:	
Plaintiffs	:	Case No. 1:16-cv-04011-ALC
	:	
v.	:	
	:	
ACE AMERICAN INSURANCE COMPANY	:	
	:	
Defendant	:	
	:	
	:	

**JOINT STATUS REPORT CONCERNING PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

The parties to this case, by and through their undersigned counsel, file this *Joint Status Report Concerning Plaintiffs' Motion for Preliminary Injunction*.

On July 6, 2016, the Court held a telephone status conference in this matter. In that conference, the Court requested the submission of evidence related to issues raised by Plaintiffs' Motion for Preliminary Injunction. The Court ordered the parties to submit a Joint Status Report by July 29, 2016. (*See* Minute Entry, July 6, 2016). In accordance with the Court's directive, the parties, Plaintiffs DISH Network Corporation and DISH Network L.L.C. ("DISH") and Defendant ACE American Insurance Company, Inc. ("ACE") have agreed to the following plan for further proceedings:

July 25, 2016: The parties serve written discovery. DISH and ACE have complied with this deadline. DISH served Requests for Production and Interrogatories on ACE. ACE served Requests for Production on DISH.

August 12, 2016: Responses to the above discovery requests due, which includes written responses, objections, and documents.

August 22, 2016 through September 30, 2016: Depositions will be held. The parties will schedule depositions after receiving and reviewing discovery responses. The parties are hopeful that any discovery disputes can be resolved either prior to depositions, or prior to September 30, 2016, but the deposition schedule may need to be adjusted depending on the outcome of discovery exchanges on August 12, 2016.

Fourteen (14) calendar days after the last deposition: The parties will file briefs in support of their respective positions.

Ten (10) calendar days after briefs are filed: The parties will file responses. No reply briefs will be filed without prior leave of Court.

The parties reserve the right, either independently or jointly, to request an evidentiary hearing. The request for an evidentiary hearing may be made at any time, but will not be scheduled until after depositions are complete.

Respectfully submitted,

DATED: July 29, 2016

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Plaintiffs,	:	Case No. 1:16-cv-4011-ALC
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v.	:	
	:	
ACE AMERICAN INSURANCE COMPANY	:	
	:	
Defendant.	:	
	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2016, I served the foregoing Joint Status Report Regarding Discovery Related to Plaintiffs' Motion for Preliminary Injunction by filing the document on the Court's CM/ECF system, which will provide a Notice of Electronic Filing to all parties in the case.

By:	<u>s/ Lee M. Epstein</u>
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